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Registered Importer R-90-006

NHTSA-02-11647-1

**Petition For Import Eligibility Determination**

**IAW 49 CFR 593.5 (A) (1)**

**CONFIDENTIAL ADDENDUM ATTACHED**

January 23, 2002

Administrator

O.V.S.C.

National Highway Traffic Safety Administration

Room 6111

400 7th St., S.W.

Washington, DC. 20590

Attn.: NEF-32 Import Eligibility

Dear Mr. George Entwistle,

The following is the basis for this petition:

**Part 593.6(a) (1)**

The vehicle for which a determination is sought is Audi A4/S4 2001. We have examined the recall campaigns and we have found that there were no listings for these vehicles. All vehicle reports will have a recall campaign search included with them at the time of submission.

**Part 593.6(a) (2)**

The vehicle which is substantially similar to the petition vehicle is the US version.

**Part 593.6(a) (3)**

The vehicle which we believe to be substantially similar is manufactured for sale in the USA and it was certified to meet all applicable Federal Motor Vehicle Safety Standards ("FMVSS") in effect at the time of manufacture. The non-

conforming model was not listed on the accepted DOT list in 55 FR 219, pp219, 47418ff, or the updates that have been published. The differences between the USA model and the non-certified model are very minor and have been outlined in this petition,

**Part 593.6(a) (4)**

Since a USA companion model exists, we seek your determination that our petition vehicle is substantially similar to the USA model and therefore is eligible for importation and modification in the "substantially similar" category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the parts lists from Europe and the USA to determine both what differences exist and what parts will be necessary to bring our non-conforming model into conformance with air-applicable FMVSS in effect at the time of manufacture. These differences and changes have been outlined in the following examination of each applicable FMVSS.

**Part 593.6(a) (5)**

The following outline will show that our non-conforming vehicle was originally manufactured to conform to the FMVSS in many areas in the same manner as its U.S. companion model, many of the concerned parts have the same parts numbers as the USA model. In all areas that have to be modified the parts will be supplied by the OEM manufacturer. The modifications to this vehicle do not concern the basic structure; only easily removable and available parts.

**FMVSS 101**

These systems are included in the instrument cluster. The replacement cluster is available from the dealer and the reprogramming will allow the C.A.N. system to accept the changes.

**FMVSS 102**

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the U.S. model.

**FMVSS 103**

The windshield defogging and defrosting systems are identical to those in the U.S. model.

**FMVSS 104**

The windshield wiping and washing systems are identical to those in the U.S. model.

**FMVSS 105 - FMVSS 135**

The hydraulic brake system and the parking brake system are identical to those in the U.S. model.

**FMVSS 106**

The brake hoses are identical to those in the U.S. model.

**FMVSS 108**

The following modifications must be made to fully meet this FMVSS:

- a. Install U.S. model headlamps and front sidemarker lights.
- b. Install U.S. model taillamp assemblies which incorporate rear sidemarker lights.
- c. Inspect the U.S. model high-mounted stop light assembly.

**FMVSS 109**

This vehicle came equipped with tires that bare the "DOT" symbol.

**FMVSS 110**

A tire placard must be installed to meet this FMVSS requirement.

**FMVSS 111**

The driver's inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be changed to the U.S. companion model part to meet the requirements. See Attachment (Mirror part#) or be etched to read the appropriate language.

**FMVSS 113**

The hood latch system is identical to the one used on the U.S. model.

#### **FMVSS 114**

The key warning system are programmed at the time that the instrument cluster is changed. These systems must be inspected at the time of conversion.

#### **CFR 541**

This vehicle may require "anti-theft Markings" to comply with this standard. Cars imported must be inspected and labeled as needed.

#### **CFR 565**

A "Vehicle Identification Plate" must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS- Copies of all labels will be included in the final report.

#### **FMVSS 116**

The vehicle came equipped with DOT brake fluid and the top of the master cylinder is labeled with the DOT information.

#### **FMVSS 118**

The windows do not operate with the key off. These systems are the same as the USA models.

#### **FMVSS 124**

The accelerator control system is identical to the U.S. model.

#### **FMVSS 201**

The components subject to this FMVSS are identical to those in the U.S. companion model.

#### **FMVSS 202**

This vehicle came equipped with head restraints that are identical to those on the U.S. model,

#### **FMVSS 203**

N/A when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208. Impact for steering controls systems.

#### **FMVSS 204**

The steering shaft on this vehicle are energy absorbing and is identical to that used on the U.S. model.

#### **FMVSS 205**

The glass and glazing materials used on this vehicle are identical to those used on the U.S. model. They are clearly labeled with DOT AS-1 or DOT AS-2,

#### **FMVSS 206**

The door, locks and retention components are identical to the USA model.

#### **FMVSS 207**

The seating system in this vehicle is identical to that used in the U.S. model.

#### **FMVSS 208**

This vehicle is equipped with a seat belt warning lamp and audible warning that is identical to that used on the U.S. model. The passive restraint systems used in these vehicles consist of dual front airbags and knee bolsters. They also have combination lap and shoulder belts at the out board front seating positions as well as at the rear outboard seating positions. These manual systems are automatic, self-tensioning and are released by means of a single red push-button.

All vehicles entering the U.S.A. must be inspected to confirm that the systems bare the U.S. part # OR the airbags (Part# - See Attachment), control unit (part#- %@ Attachment), sensors and seatbelts and that the knee bolster (part#- See Attachment) has been installed. Some parts coming from European countries may need to be changed due to varying regulations. However, Gulf states vehicles have U.S. systems as standard equipment.

#### **FMVSS 209**

The seatbelt labels are identical to those on the U.S. model and they meet this FMVSS requirement.

#### **FMVSS 210**

The seatbelt anchorages are identical to those of the U.S. model.

**FMVSS 212**

The windshield intrusion zone and the parts and engineering thereof are identical to those of the U.S. model.

**FMVSS 214**

Doorbars in this vehicle are identical to those in the USA model.

**49 CFR 581 or FMVSS 215**

The bumpers and the support structure for the bumpers on these vehicles are identical to the U.S. model.

**FMVSS 216**

The body of these vehicle is identical to that of the U.S. model.

**FMVSS 219**

The windshield intrusion and the parts & components thereof, are identical to those of the U.S. model.

**FMVSS 301**

The fuel system in this vehicle are identical to that of the U.S. model. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design.

**FMVSS 302**

This vehicle is equipped with interior materials that are identical to those used on the U.S. model.

Thank you for your attention,

J.K. Technologies, L.L.C.

By: Jonathan Weisheit, President

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2002 JAN 25 PM 3:30  
J.K. TECHNOLOGIES, L.L.C.